Supporting Statement For

EPA Information Collection Request Number 1601.03

Outer Contionental Shelf Air Regulations

June 22, 1998

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) TITLE AND NUMBER OF THE INFORMATION COLLECTION

This information collection request (ICR) is entitled "Air Pollution Regulations for Outer Continental Shelf (OCS) Activities: Reporting, Recordkeeping, and Testing Requirements." ICR 1601.03 OMB Number 2060-0249

1(b) CHARACTERIZATION OF THE INFORMATION COLLECTION

Section 328 (Air Pollution From Outer Continental Shelf Activities) of the Clean Air Act (CAA) as amended in 1990, gives the Environmental Protection Agency (EPA) responsibility for regulating air pollution from OCS sources located offshore of the States along the Pacific, Arctic, and Atlantic Coasts, and along the eastern Gulf of Mexico coast (off the coast of Florida). The U.S. Department of Interior's Minerals Management Service (MMS) retained the responsibility for regulating air pollution from sources located in the western Gulf of Mexico. To comply with the requirements of section 328 of the CAA, EPA, on September 4, 1992 at 57 FR 40792, promulgated regulations to control air pollution from OCS sources in order to attain and maintain Federal and State ambient air quality standards and to comply with the provisions of part C of title I of the CAA.[1] Sources located within 25 miles of a State's seaward boundary must comply with the same State/local air pollution control requirements as would be applicable if the source were located in the corresponding onshore area (COA).[2] Sources located more than 25 miles from a State's seaward boundary (25 mile limit) must comply with EPA air pollution control regulations. The regulations are codified as part 55 of chapter I of title 40 of the Code of Federal Regulations (CFR). On September 2, 1997, EPA made two court-ordered revisions to the regulations. The references for the sections of the OCS regulations that pertain to the burden activities addressed in this ICR are shown in Table 1.

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[1]Part C of title I of the CAA specifies requirements for the prevention of significant deterioration of air quality in areas where the air quality is better than the national ambient air quality standards for criteria pollutants. Sources which will be located within 25 miles of the State seaward boundary, and for which the corresponding onshore area is designated as nonattainment for one or more criteria pollutants, will have to comply with part D (Plan Requirements For Nonattainment Areas) of title I of the CAA.

[2]Section 328 of the 1990 CAA defines "corresponding onshore area," with respect to any OCS source, as the onshore attainment or nonattainment area that is closest to the source, unless the EPA Administrator determines that another area, with more stringent requirements with respect to the control and abatement of air pollution, may reasonably be expected to be affected by such emissions.

This ICR addresses the information collection burden (i.e., hours and costs) to industry respondents who are subject to the reporting, recordkeeping, and testing requirements of the OCS air regulations. Industry respondents include owners or operators of existing and new or modified stationary sources. This ICR also addresses the burden to the agencies who are responsible for implementing and enforcing the OCS regulations. The EPA has delegated the authority to implement and enforce the OCS regulations for sources located off the coast of California to four local air pollution control agencies. The EPA implements and enforces the regulations for all other sources under its jurisdiction. All burden estimates are calculated for the 3-year period beginning September 1, 1998 and ending August 31, 2001.

To be consistent with terminology used by the MMS, OCS sources associated with the recovery of oil and gas resources are characterized according to one of the following operational phases. The first phase consists of exploration activities which are conducted from temporarily placed vessels or structures. Drilling of an exploration or delineation well generally last 2 to 3 months, but can last up to 6 months. The second phase consists of the construction and installation of a permanent production platform on the seabed and the associated "topside" (above sea level) structures. A typical construction phase lasts from 6 to 12 months. The third phase consists of the development drilling of wells from which the oil and gas resources are extracted, and the long-term operations and maintenance of the production facility over the life of the field or structure. A typical development/production phase can last for over 30 years. These three phases are referred to as exploration, construction, and development/production, respectively, throughout the remainder of this ICR.[3]

The MMS receive development plans from the companies authorized to conduct exploration and development of the OCS

[3] Reference: A.T. Kearney, Inc. *Control Costs Associated With Air Emission Regulations For OCS Facilities*, Final Report, September 30, 1991. Prepared for the Office of Air Quality Planning & Standards, U.S. Environmental Protection Agency, Research Triangle Park, N.C. 27711 under EPA Contract No. 68D80094.

tracks. From those plans, MMS estimates[4] the following new OCS activities will occur in the 1998 to 2001 time frame:

Alaska Coast: 4 exploratory wells and 1 production platform.

Pacific Coast: 3 to 4 exploratory wells.

Eastern Gulf of Mexico:
- Destin Dome -- 20 development wells and 18 production platforms,
- Other areas -- 15 exploratory well, 3 development wells and 4 production platforms.

Atlantic Coast: 1 exploratory well approximately 40 miles off the coast of North Carolina.

There is a great deal of uncertainty regarding the timing and number of eastern Gulf of Mexico projects because of litigation and political constraints. In addition, the permit requests for a number of the development wells and the production platforms could be combined and processed as a unit. For this ICR, it was assumed that a total of 18 permit requests for the development wells and production platforms would be submitted for the Destin Dome track and four permits for the other development wells and production platforms off the Florida coast. In addition to the new OCS facilities, there are 27 existing OCS facilities under EPA jurisdiction, all off the coast of California. All the sources except for the exploratory well off the coast of North Carolina are expected to be within the 25-mile limit.

Based on the MMS projections, the following OCS facilities were assumed for the purposes of this ICR:

Sources under EPA authority

Existing development/production sources	0
Exploratory wells within 25-mile limit	19
Exploratory wells beyond 25-mile limit	1
New development/production sources	23

[4] Memorandum from Herkhof, D., Minerals Management Service, Department of Interior, to Stonefield, D., U.S. Environmental Protection Agency. March 6, 1998. Projected OCS Activities for Period 1998-2001. The memorandum provided a projected range of 4 exploratory wells and one new platform off the coast of Alaska, 3 to 4 exploratory wells off the coast of California, 15 exploratory wells, 23 development wells, and 22 platforms off the coast of Florida in the Gulf of Mexico and 1 exploratory well off the coast of North Carolina.

Sources under the authority of the local agencies

Existing development/production sources	27
Exploratory wells	4
New development/production sources	0

The information collection activities for which burden estimates are calculated are summarized below. The terms "new" and "existing" source refer to whether the source's activity is new or existing rather than the source itself. All development/ production sources projected by the MMS are assumed to be major under the Title V Operating Permits Program and/or the Federal New Source Review Program. As a result, resource burdens to industry, State and local agencies, and the EPA may be overestimated. The exploration sources under EPA authority are considered to be minor sources. However, those exploration sources would still have to submit applications to EPA as OCS sources.

Industry Respondent Activities for New or Modified OCS Sources

- The owner or operator of a proposed new or modified OCS source that locates within the 25-miles limit is required to prepare a notice of intent (NOI) to construct. Not more than 18 months prior to submitting a permit application, the owner or operator must submit a NOI to construct to the EPA's Regional Office and to the air pollution control agencies of the nearest onshore area (NOA) and onshore agencies adjacent to the NOA.[5] This requirement is expected to affect 23 new exploration sources and 23 development/ production sources, and is a one-time-only burden activity for the source. The number of modified sources which will be subject to this requirement is unknown.

- The owner or operator of any new or modified major OCS source must submit a preconstruction permit application to a permit reviewing authority for approval before the owner or operator can begin construction of the source.[6] Each owner or operator is responsible for developing or collecting all relevant information not otherwise available to the permit

[5] As defined in Section 55.2 of the OCS regulation, "NOA means, with respect to any OCS source, the onshore area is geographically closest to that source."

[6] The permit reviewing authority is either the State or local air pollution control agency within whose jurisdiction the applicant is seeking approval to construct, or the EPA. The EPA will retain jurisdiction if the EPA has not approved delegation of permit reviewing authority to the State or local air pollution control agency.

reviewing authority. The information contained in the permit will be used by the permit reviewing authority to ensure that the source will comply with the requirements of the CAA. After the permit application has been approved and construction has been completed, the owner or operator will be required to complete initial compliance tests of its turbines and/or internal combustion engines to demonstrate compliance with its preconstruction permit. This requirement is expected to affect 23 new development/ production sources and is a one-time-only burden activity for each source. The number of modified sources which will be subject to this requirement is unknown.

Industry Respondent Activities for New and Existing Sources under the Regulatory Authority of Local Air Pollution Control Agencies

- Owners or operators of existing development/production sources that will be under the regulatory authority of local agencies will be required to obtain operating permits and will be subject to annual compliance testing, recordkeeping, and reporting requirements to demonstrate compliance with their operating permits. This requirement is expected to affect 27 existing development/production sources. This activity is considered a periodic activity because it was assumed that local regulations will require the existing sources to renew their operating permit once during the time period covered by this ICR. Since the exploratory well operate only a short period of time (from 2 to 6 months), they are not required to obtain an additional operating permit.

Industry Respondent Activities for New and Existing Sources under the Regulatory Authority of EPA

- Owners or operators of new development/production facilities that will be under the regulatory authority of the EPA will be required to obtain operating permits and will be subject to recordkeeping and reporting requirements to demonstrate compliance with their operating permits. This requirement is considered a one-time-only activity and expected to affect up to 23 development/production sources.

State and Local Agency Activities

- State or local air pollution control agencies can formally request the EPA for the delegation of authority to implement and enforce the OCS regulations. Over the next 3 years, no additional delegation requests are expected to be submitted to the EPA.

- The EPA has delegated authority to implement and enforce the OCS regulations to four local agencies in California (Santa Barbara County Air Pollution Control District (SBCAPCD), South Coast Air Quality Management District (SCAQMD), Ventura County Air Pollution Control District (VCAPCD), and San Luis Obispo County Air Pollution Control District (SLOCAPCD)). Those agencies will provide guidance to owners or operators of proposed new or modified sources for preparing NOI's and preconstruction permit applications, review permits for completeness, and conduct public hearings prior to permit approval. Those local agencies will also submit permit applications to the EPA and Federal Land Managers if the source's emissions potentially affect Federal Class I areas. The agencies will also oversee and attend initial compliance tests after new or modified sources have completed construction under an approved preconstruction permit. Four new exploration sources are expected to locate in areas under the regulatory authority of a local agency where the source will be subject to the NOI to construct and preconstruction permit requirements. These requirements are considered one-time-only burden activities for the local agency. The number of modified sources expected to occur in areas under the regulatory authority of State and local agencies is unknown.

- Those four local agencies will provide guidance to owners or operators of affected sources for preparing operating permits, overseeing and attending annual compliance tests, conducting quarterly inspections, reviewing reports submitted by owners or operators, and conducting public hearings prior to permit approval. These requirements are considered annual activities and are expected to affect three to four new exploration sources and 27 existing development/production sources under the regulatory authority of the local agencies.

<u>EPA Activities</u>

- The EPA must review delegation requests submitted by State and local agencies to receive authority to implement and enforce the OCS program. Over the next 3 years, the EPA does not expect to receive any delegation requests.

- Where State or local agencies are not delegated authority to implement and enforce the OCS program, the EPA will provide guidance to owners or operators of new or modified sources for preparing NOI's to construct and preconstruction permit applications, review permits for completeness, conduct public hearings prior to permit approval, and submit

preconstruction permit applications to Federal Land Managers if the source's emissions potentially affect Federal Class I areas. The EPA will also oversee and attend initial compliance tests conducted after a new or modified source has completed construction under an approved preconstruction permit. Up to 23 new development wells/platforms and 20 new exploration sources are projected to be under the EPA's regulatory authority over the 3-year time period covered by this ICR. For each source, these requirements are considered one-time-only burden activities for the EPA. There are no existing sources under the EPA's regulatory authority.

- Where State or local agencies are not delegated authority to implement and enforce the OCS program, the EPA will provide guidance to owners or operators of affected sources for preparing operating permits, review and act on operating permit applications, and conduct public hearings prior to permit approval. The EPA will also review annual reports submitted by owners or operators. These activities are expected to affect 20 new exploration sources and 23 new development/production sources. The EPA's burden associated with each source's operating permit is considered a one-time-only burden activity.

- The EPA will also perform annual reviews of regulations adopted by onshore areas to determine if the regulations are consistent with the OCS regulations. The EPA expects that this activity will require one-half of a full-time equivalent employee per year over the next 3 years.

- If a State or local agency requests COA designation by the EPA, the EPA will review and approve or deny such request. The burden associated with this requirement was not estimated because no new requests for delegation of authority is expected to be received during the time period covered by this ICR.

2. NEED FOR AND USE OF THE COLLECTION

2(a) NEED / AUTHORITY FOR THE COLLECTION

The need and authority for this information collection is contained in section 328 of the CAA and in EPA OCS Air Regulations, codified as title 40 CFR part 55. Section 328 requires the Administrator of the EPA to establish requirements to control air pollution from OCS sources to attain and maintain Federal and State ambient air quality standards and to comply with the provisions of part C of title I of the CAA. This requirement applies to OCS sources located in U.S. coastal waters except for the western Gulf of Mexico (west of longitude 87 degrees and 30 minutes). For sources located within 25-mile limit, such requirements must be the same as would be applicable if the source were located in the COA, and include but not be limited to State and local requirements for emission controls, emission limitations, offsets, permitting, monitoring, testing, and reporting. (Except for Florida, the seaward boundary of States is 3 miles from shore. For Florida, the seaward boundary is 3 leagues or approximately 9 miles from shore.) The Administrator must update the requirements as necessary to maintain consistency with onshore regulations. The authority of section 328 of the CAA supersedes section 5(a)(8) of the Outer Continental Shelf Lands Act, but does not repeal or modify any other Federal, State, or local authorities with respect to air quality. Each requirement established under section 328 is treated, for purposes of sections 113 (Federal Enforcement), 114 (Inspections, Monitoring, and Entry), 116 (Retention of State Authority), 120 (Noncompliance Authority), and 304 (Citizen Suits) of the CAA, as a standard under section 111 and a violation of any such requirements will be considered a violation of section 111(e) of the CAA.

Section 110 of the CAA requires all States to submit an implementation plan which contains a preconstruction review program for all new or modified stationary sources, including any provisions necessary for this program to meet the specific requirements of parts C and D related to construction. Section 110 of the CAA requires that no new or modified stationary source, in conjunction with emissions from existing sources in the same area, can interfere with the attainment or maintenance of the national ambient air quality standards (NAAQS). This effectively means that no source can construct without getting a permit to ensure that the objectives of the CAA are met. Construction activity begins with site preparation and ends when the source becomes operational. As in other industries, any equipment fabricated off-site should be constructed to meet

permit requirements. These permit requirements must be met before equipment can be installed and approved.

Part C of the CAA outlines specific construction requirements for new and modified sources constructing in attainment areas. These requirements are more commonly referred to as those intended to prevent significant air quality deterioration. The prevention of significant deterioration (PSD) rules require a prospective source to demonstrate that the increment will not be exceeded, to demonstrate that the NAAQS will not be exceeded, to apply best available control technology (BACT), and to protect Federal Class I areas (e.g., national parks) from adverse impacts.

Similarly, part D of the CAA specifies construction requirements for new and modified sources constructing in nonattainment areas designated pursuant to section 107 of the CAA. Part D rules require a prospective construction project to ensure the application of lowest achievable emission rate (LAER), certify that all sources owned or controlled by the same person (or persons) are in compliance with all air emissions regulations, and secure additional reductions in existing source emissions beyond those necessary to show attainment and maintenance of the applicable NAAQS.

2(b) USE / USERS OF THE DATA

NOI to Construct

The owner or operator of a proposed new or modified development/production sources that are located within the 25-mile limit will be required to prepare a NOI to construct. The owner or operator must submit a NOI to construct to the EPA Administrator through the EPA Regional Office and the air pollution control agency of the NOA and adjacent onshore areas not more than 18 months prior to submitting a permit application. The purposes of the NOI are to (1) trigger an EPA review of onshore regulations to determine if they are consistent with the OCS regulations and, (2) to allow adequate time for onshore areas, other than the NOA, to determine if they will petition the EPA for designation as the COA.

Preconstruction Permit Applications

Compliance with all applicable preconstruction permit requirements is necessary before the owner or operator can commence construction or modification to its source. The owner or operator of an OCS source is responsible for developing or

collecting all relevant information not otherwise available to the permit reviewing authority. The permit reviewing authority reviews the application materials submitted by the owner or operator and either declares the permit application complete for processing or provides the owner or operator with guidance on how to correct the deficiencies in the application. The applicant must then collect the additional data identified by the permit reviewing authority in order for the permit application to be deemed "complete." Although sufficient information must be submitted by the applicant before its permit can be classified as complete, some additional clarifying information can be submitted at a later date by the applicant to assist the permitting authority in processing the permit application.

For sources which will be constructed or modified in attainment areas, the permit application information will be used by the permit reviewing authority to determine whether the source will cause or contribute to a violation of PSD increments and NAAQS, whether BACT will be applied, and whether the source's emissions will adversely affect air quality related values in any Federal Class I areas. For sources which will be constructed or modified in nonattainment areas, the permit application information will be used by the permit reviewing authority to determine whether the source will apply LAER, achieve the required emissions offsets, and whether the source has demonstrated that all of its other sources are in compliance with all applicable air emissions regulations. The application and supporting data for permit decisions must also be made available to the general public for at least 30 days before the permit can be finally issued. In addition, EPA operates a BACT/LAER Clearinghouse which contains many BACT and LAER determinations to aid sources and application reviewers in identifying reasonable control technology proposals. The BACT or LAER information in each permit will be gathered and submitted for entry into the BACT/LAER Clearinghouse data base as a reference for making future control technology determinations. Information on BACT and LAER determinations is available to the public through the National Technical Information Service and the EPA's Office of Air Quality Planning and Standards' Technology Transfer Network.

Operating Permit Applications

New and existing development/production sources are also subject to operating permit requirements. For example, the SBCAPCD's Rule 210 requires existing development/production sources to obtain a permit to operate (PTO). Rule 210 also requires that a source's PTO be reviewed and updated once every 3 years. However, the new exploration sources only operate a short period of time (2 to 6 months), and the PTO is issued in

conjunction with any new source review permit. For the time period for this ICR, 27 existing development/production sources are expected to renew their PTO's. To estimate the burden associated with preparing and obtaining approval of a PTO, the SBCAPCD's regulations were used as a model. For the new development/production sources that will be under the EPA's regulatory authority, it was assumed that these sources would be required to obtain title V operating permits.

At a minimum, the operating permits will contain information on the ownership and location of a source, equipment and fuel parameters which cause emissions, the amount and type of emissions from each source, control techniques used to control emissions, and recordkeeping and reporting requirements to ensure that control techniques are properly implemented. The information in operating permits will be used by regulatory authorities to assess a source's compliance with the OCS regulations, to assess emissions fees, and to assess noncompliance penalties.

Compliance Tests

Each new or modified source which completes construction under an approved preconstruction permit will be required to complete initial compliance tests to demonstrate compliance with control equipment design and performance specifications in its preconstruction permit. In addition, annual compliance tests are required for existing sources in California. For the three new exploration and 27 existing development/production sources off the coast of Southern California, local air pollution control agencies will require the sources to perform an initial or annual compliance test to demonstrate compliance with their PTO's. The title V regulations do not require owners or operators of sources to perform compliance tests to demonstrate compliance with their operating permits. Therefore, it was assumed that the new exploration sources projected to be under the regulatory authority of the EPA will not be subject to initial/annual compliance testing requirements. The new development/production sources under EPA authority are assumed to be subject to initial compliance tests.

3. THE RESPONDENTS AND THE INFORMATION REQUESTED

3(a) RESPONDENTS / STANDARD INDUSTRIAL CLASSIFICATION (SIC) CODES

Section 328(a)(4)(C) of the CAA defines "OCS sources" as ". . . any equipment, activity, or facility which:

- Emits or has the potential to emit any air pollutant,
- Is regulated or authorized under the Outer Continental Shelf Lands Act, and
- Is located on the Outer Continental Shelf or in or on waters above the Outer Continental Shelf.

Such activities include, but are not limited to, platform and drill ship exploration, construction, development, production, processing, and transportation. Emissions from any vessel servicing or associated with an OCS source, including emissions while at the OCS source or en route to or from the OCS source within 25 miles of the OCS source, will be considered direct emissions from the OCS source."

The EPA has delegated regulatory authority to SBCAPCD, SCAQMD, VCAPCD, and SLOCAPCD for OCS sources located within the 25-mile limit. Currently, 27 development/production sources are located in near-shore waters which will be under the regulatory authority of the SBCAPCD, SCAQMD, and VCAPCD.

The MMS provided the EPA with projections of exploration wells and development/production activities for the time period for this ICR, from September 1998 through August 2001. Based on that information, new OCS sources are expected to occur in four OCS planning areas over the 3-year time period covered by this ICR. Table 2 shows the OCS planning areas in which new OCS sources are expected to occur; the number of new exploration, construction, and development/production sources expected to occur in each of the planning areas; and the regulatory authority for the planning areas.

The four new exploratory wells to be drilled off the coast of southern California will be regulated by the local districts which have received delegation of the implementation and enforcement authority from EPA. The specific district which would regulate the new sources are not known. Therefore, to simplify the analysis of the burden estimates for this ICR, it was assumed that all three sources will be subject to regulations

as if they were constructed off the coast of Santa Barbara County and that the sources would operate up to 12 months.

The new sources in the eastern Gulf of Mexico, off the coast of Alaska and off the coast of North Carolina will be under the regulatory authority of the EPA. Since significant lead time is required for the construction of platforms, it is assumed that the new development/production sources will operate an average of 12 months during the time period covered by this ICR. It is also assumed that the exploration sources will operate an average of less than 6 months.

The SIC codes for sources which may be subject to the OCS regulations include the following:

- Major Group 13 - Oil and Gas Extraction
  - SIC code 1311 - Crude petroleum and natural gas
  - SIC code 1321 - Natural gas liquids
  - SIC code 1382 - Oil and gas field exploration services
- Major Group 44 - Water Transportation
  - SIC code 4449 - Water transportation of freight, not elsewhere classified
  - SIC code 4492 - Towing and tugboat services
- Major Group 46 - Pipelines, Except Natural Gas
  - SIC code 4612 - Crude petroleum pipelines
- Major Group 49 - Electric, Gas, and Sanitary Services
  - SIC code 4922 - Natural gas transmissions

3(b) INFORMATION REQUESTED

The data and information requirements associated with the OCS regulations vary depending on whether a source is located in an attainment or nonattainment area, and whether a source will be subject to EPA or State and/or local agency regulations. For example, State or local agencies which have regulatory authority may have more stringent regulations than those required by EPA's New Source Review (NSR) regulations for implementing parts C and D of title I of the CAA, or those required by the EPA's operating permits regulations for implementing title V of the CAA.

For the purposes of this ICR, it was assumed that the 20 new exploration sources under the EPA's regulatory authority would be considered minor sources locating in attainment areas and not subject to the operating permit requirements of title V of the CAA.

State and/or local agencies to which the EPA delegates regulatory authority for the OCS regulations must ensure that their regulations comply with the requirements of the EPA's part C and part D regulations. Therefore, a source which will be located in an attainment area for a pollutant and under the regulatory authority of a State and/or local agency will, at a minimum, have to comply with the data and information requirements for the EPA's part C PSD regulations. A source which will impact a nonattainment area for a criteria pollutant and will be under the regulatory authority of a State and/or local agency will, at a minimum, have to comply with the EPA's part D regulations. New sources off the coast of Southern California were assumed to be in a nonattainment area offshore of Santa Barbara County.

The SBCAPCD's Rule 202 (paragraph (C)(h)) requires a source with drilling rig engines exceeding a total of 300 brake horsepower to obtain an Authority to Construct (ATC) permit and a PTO if nitrogen oxide emissions from all of the source's drilling rig engines exceed 25 tons in any consecutive 4 calendar quarters.[7] This type of source is treated as a stationary source under the SBCAPCD's regulations. For the purpose of this analysis, it was assumed that three new exploration sources anticipated for the Southern California planning area will exceed the brake horsepower and emissions threshold limits and will be subject to the ATC and PTO requirements. The sources will also have to prepare and submit an NOI to construct in accordance with the requirements of the OCS regulations.

The Santa Barbara area is classified as nonattainment for the Federal and California ozone standards and the California particulate matter with an aerodynamic diameter less than 10 microns (PM-10) standard; attainment for the Federal PM-10 standard; and attainment for the Federal and California nitrogen dioxide, sulfur dioxide, carbon monoxide, and lead standards.[8] Therefore, new or modified exploration and development/production sources will have to undergo preconstruction review to determine if they will have to obtain a part D preconstruction permit for the nonattainment pollutants and a part C PSD preconstruction permit for the attainment pollutants. The SBCAPCD's Rules 201

[7] The SBCAPCD's regulations refer to preconstruction permits as "Authority to Construct" permits and operating permits as "Permits to Operate." For this ICR, the terms "Authority to Construct" and "Permits to Operate" are used when discussing the SBCAPCD's regulations.

[8] Typical exploration and development/production sources are not expected to exceed the emissions threshold for carbon monoxide or lead and, therefore, would not have to obtain a PSD Authority to Construct permit for these two pollutants.

and 205 contain the part C and part D preconstruction permit requirements to which the source will be subject.

(i) Data Items

New or Modified Sources: NOI to Construct

New or modified sources that will be located within the 25-mile limit will have to prepare and submit an NOI to construct not more than 18 months before submitting a permit application. The NOI must be submitted to the EPA Administrator through the EPA Regional Office and the air pollution control agency of the NOA and adjacent onshore areas. The data and information requirements which a source must include in a NOI to construct must include the following minimum information:

- General company information, including company name and address, owner's name and agent, and facility site contact.
- Facility description in terms of the process and products, including identification by SIC code.
- Estimate of the proposed project's potential emissions of any air pollutant, expressed in total tons per year and in such other terms as may be necessary to determine the applicability of requirements of section 55.4 of the regulation. Potential emissions for the project must include all vessel emissions associated with the proposed project in accordance with the definition of potential emissions in section 55.2 of the regulation.
- Description of all emission points including associated vessels.
- Estimate of quantity and type of fuels and raw materials to be used.
- Description of proposed air pollution control equipment.
- Proposed limitations on source operations or any work practice standards affecting emissions.
- Other information affecting emissions, including where applicable, information related to stack parameters (including height, diameter, and plume temperature), flow rates, and equipment and facility dimensions.

- Such other information as may be necessary to determine the applicability of onshore requirements.

- Such other information as may be necessary to determine the source's impact in onshore areas. Exploration sources are exempt from this requirement.

In the past, owners or operators of new sources have had to include these data items in parts C and D preconstruction permit applications. Therefore, collection of these data items for an NOI to construct is not considered an additional burden over the data items presently required in preconstruction permit applications.

New or Modified Sources: Preconstruction Permit Applications

All new or modified sources are required to prepare and submit a preconstruction permit application. Table 3 summarizes the data and information requirements which must be included in all part C PSD preconstruction permit applications. Table 3 also shows the references for the data and information requirements specified in the CAA and the current regulations specified in the CFR. The first CFR reference shown for each requirement in Table 3 pertains to the requirements under part 51 which governs the way States implement part C programs. The second CFR reference (shown in brackets) pertains to the requirements under part 52 which governs the way the EPA implements part C programs when States fail to implement part C programs.

Table 4 summarizes the data and information requirements which must be included in all part D preconstruction permit applications. Table 4 also shows the references for the data and information requirements specified in the CAA and the current regulations specified in the CFR.

The SBCAPCD's Rule 201 (Permits Required) requires the owner or operator of a new OCS source to obtain an ATC permit before the owner or operator can begin construction of the source. Paragraphs C.4, C.5, and C.6 of Rule 201 also specify the data which an owner or operator must include in a part D and part C ATC permit application. These data and information requirements are summarized in Table 5.

The SBCAPCD's Rule 205 (Standards for Granting Applications) specifies the requirements that the owner or operator of a new source must meet before the SBCAPCD will issue an ATC permit. The requirements for part D and part C permits are specified in section 3.a and 3.b of Rule 205, respectively. The requirements contained in section 3.b of Rule 205 are similar to the

requirements contained in EPA's part C PSD regulations. However, section 3.b is more stringent than the EPA's PSD regulations because section 3.b requires the owner or operator of a proposed new source to obtain emissions offsets from existing sources sufficient to offset all anticipated quarterly emissions increases associated with the new source.

Section 3.a of Rule 205 requires the owner or operator of a new source to prepare an ATC permit application to show that emissions which are precursors to ozone and PM-10 formation are controlled sufficiently to ensure that the source will not exceed the Federal and California ozone standards and the California PM-10 standard. Precursors to ozone formation include volatile organic compounds and nitrogen oxides. Precursors to PM-10 formation include volatile organic compounds, nitrogen oxides, and sulfur oxides. The requirements in the SBCAPCD's section 3.a are similar to the EPA's part D regulations. However, the SBCAPCD's rules will be more stringent than the part D requirements in three respects. First, Rule 205 requires an emissions offset ratio of 1.2 to 1 where the part D emissions offset ratio is 1.15 to 1 for volatile organic compound emissions. Second, Rule 205 requires air quality modeling, but the EPA's part D regulations do not explicitly require air quality modeling.[9] Third, Rule 205 will require the owner or operator of a new source that will be located in a nonattainment area for a pollutant to obtain an ATC permit if the source will cause <u>any</u> increase in emissions that contribute to the formation of the nonattainment pollutant, where the EPA's part D regulations require the owner or operator of a source to obtain a preconstruction permit if the source's emissions exceed specified emissions thresholds.

<u>New and Existing Sources: Operating Permits</u>

For the purpose of this analysis, it was assumed that some of the new development/production sources which will be under the EPA's regulatory authority will be required to obtain title V operating permits before becoming fully operational. Operating permits typically contain the following minimum information requirements:

[9] The requirements for an air quality modeling may be waived by the SBCAPCD if (1) the applicant submits sufficient information to demonstrate that emissions from the new source will result in a net air quality benefit or, (2) the applicant will use new or innovative control technology which will result in a significantly lower emission rate than would have occurred with the use of previously known BACT, and which will likely serve as a model for technology to be applied to similar sources within the State.

- Ownership and location of the source;

- An inventory of the type and amount of emissions associated with each piece of equipment used at the source;

- Emissions control techniques for each piece of equipment; such techniques may include process design or operational changes to equipment, add-on control equipment, and inspection and maintenance procedures;

- Recordkeeping requirements to ensure that control techniques and inspection and maintenance procedures are being properly implemented;
- Annual compliance testing requirements;

- Reporting requirements for the periodic submittal of recordkeeping or test data for review by the regulatory authority.

The 27 existing development/production sources off the coast of Southern California are required to obtain PTO's. The information which these sources are required to include in their PTO's is similar to the types of information shown above for title V operating permits.

The SBCAPCD's Rule 202 (paragraph (C)(h)) requires new exploration sources to obtain PTO's. According to the SBCAPCD, recordkeeping and reporting requirements are added to a source's ATC permit which is then converted to the source's PTO when the source is ready to become operational. Therefore, the only additional data items a source must collect are associated with the recordkeeping requirements in its PTO. Under Rule 202 (paragraph (C)(h)(3)), owners or operators of drilling rigs are required to maintain a log book of fuel use. The log book is to contain the following entries:

- Name, identification number, and location of each well;

- Start and end dates of drilling;

- Daily fuel use as determined by dipstick measurement and fuel deliveries or other means approved by the SBCAPCD.

<u>New and Existing Sources: Compliance Testing</u>

New exploration and development/production sources are required to perform initial compliance tests to demonstrate compliance with the control equipment design and performance specifications in their preconstruction permits before they can

obtain operating permits. For the purpose of this analysis, it was assumed that four new exploration sources which will be under the regulatory authority of the delegated programs will perform their initial compliance tests between September 1998 and August 2001.

Annual compliance tests are required for the 27 existing development/production sources located within the 25-mile limit of California. The purpose of the annual testing requirements is to demonstrate that each source is in compliance with its operating permit. For the purpose of this analysis, it was assumed that these sources would be subject to 3 years of annual compliance testing.

(ii) Respondent Activities

New or Modified Sources: NOI to Construct

The following items are a comprehensive list of the activities that the owner or operator of a new development/ production OCS source will have to perform to prepare and submit an NOI to construct:

- Read applicable regulations to determine compliance requirements;

- Inquire or meet with the appropriate permit reviewing authority to obtain guidance on what data are needed to meet the applicable requirements;

- Prepare NOI to construct;

- Submit the NOI to construct to the EPA Administrator through the EPA Regional Office and to the air pollution control agency of the NOA and adjacent onshore areas.

New or Modified Sources: Preconstruction Permit Applications

The following items are a comprehensive list of the activities that the owner or operator of a new exploration or development/production source will have to perform to prepare a preconstruction permit application if the source is subject to part C PSD regulations:

- Read applicable regulations to determine compliance requirements;

- Inquire or meet with the appropriate permit reviewing authority to obtain guidance on what data are needed to meet the applicable requirements;

- Prepare BACT engineering analysis;

- Perform air quality modeling;

- Perform pre- and post-construction air quality monitoring (if not already available);

- Determine impacts on air quality related values in Federal Class I areas;

- Submit application to the U.S. Fish and Wildlife Service for endangered species impact analysis;

- Prepare and submit permit application;

- Attend public hearing;

- Revise permit application per comments received from the permit reviewing authority and/or public comments.

For the purpose of this analysis, it was assumed that 22 permit requests for development/production sources off the Florida coast will be submitted. It was also assumed that the sources requesting these permits and the source requesting a permit for the new OCS development/production sources off the coast of Alaska will have to perform the activities shown above. However, the level of effort associated with performing the activities as shown above will vary from source to source depending on the types and amounts of pollutants emitted by the source, location of the source, and availability of existing information such as air quality and modeling data. For example, an owner or operator will not have to perform dispersion modeling analyses to determine impacts on air quality related values in a Federal Class I area if the source's emissions will not impact a Federal Class I area. In addition, an owner or operator will only have to perform monitoring if requested by the permit reviewing authority.

The four new exploration sources expected to occur off the coast of Southern California were assumed to be subject to the SBCAPCD's regulations. As a result, the sources will undergo part D preconstruction review because the Santa Barbara onshore area is classified as a serious nonattainment area for ozone and moderate nonattainment for PM-10. The sources will also have to undergo part C PSD preconstruction review for the attainment pollutants (i.e., nitrogen dioxide, sulfur dioxide, carbon monoxide, and lead). However, the source is not expected to

exceed the emissions thresholds for carbon monoxide or lead and, therefore, would not have to obtain an ATC permit for these two pollutants. Generally, the burden associated with preparing a part D permit application is less than the burden associated with preparing a part C PSD permit application because a source preparing a part D permit application typically will not have to perform ambient modeling. However, because section 3.a of Rule 205 of the SBCAPCD's regulations requires ambient modeling, it was assumed that the source will have to perform all of the activities shown above in order to prepare an ATC permit application for both nonattainment and attainment pollutants. The source would be required to prepare a LAER and a BACT engineering analysis for nonattainment and attainment pollutants, respectively. In the SBCAPCD's Rule 201, LAER and BACT requirements are included together under the paragraph C.5 (see Table 5). It was assumed that the owner or operator of a source subject to the SBCAPCD's regulations will also have to demonstrate that emissions offsets have been achieved for the precursors to ozone and PM-10, and that the offsets would be sufficient to meet the offset requirements for the attainment pollutants (i.e., nitrogen dioxide and sulfur dioxide).

New and Existing Sources: Operating Permits

In general, the activities which new or modified and existing sources will have to perform to prepare an operating permit application include the following:

- Read applicable regulations to determine compliance requirements;
- Inquire or meet with the appropriate permit reviewing authority to obtain guidance on what data, compliance testing, and recordkeeping and reporting activities are needed to meet the applicable requirements;
- Prepare and submit permit application;
- Attend public hearing;
- Revise permit application per comments received from the permit reviewing authority and/or public comments.

The SBCAPCD's Rule 202 (paragraph (C)(h)) requires new exploration sources to obtain a PTO. According to the SBCAPCD, recordkeeping and reporting requirements are added to a sources' ATC permit which are then converted to the sources' PTO when the sources are ready to become operational. Therefore, the owner or operator of an exploration source will have to prepare a PTO application containing all relevant information from its ATC permit and recordkeeping and reporting requirements determined by

the SBCAPCD. Once an owner or operator has obtained approval of its PTO application, the owner or operator will have to submit its log book for each well drilled to the SBCAPCD within 60 days after drilling has been terminated. The SBCAPCD's regulation requires the drilling contractor to certify and submit a copy of the fuel log book records, or summary thereof, showing the total amount of fuel used during the drilling of each well.

New and Existing Sources: Compliance Testing

For the purposes of this analysis, it was assumed that development/production sources would use Reference Method 20 to test for nitrogen oxide emissions from gas turbines. For development/production and exploration sources that have internal combustion engines, it was assumed that the instrumental methods of Reference Methods 3A, 6C, and 7E using the electro-chemical cell methodology would be used to test for nitrogen oxide, carbon monoxide, hydrocarbon, and sulfur dioxide emissions. The activities associated with completing compliance tests are as follows:

- Prepare a pretest plan and submit the plan to the appropriate permit reviewing authority for review and approval at least 30 days before conducting the tests;
- Clean and calibrate test equipment for tests;
- Perform tests;
- Analyze samples, summarize data, and write report.

4. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

4(a) AGENCY ACTIVITIES

State and Local Agency Activities

Agencies delegated authority for the OCS program are responsible for processing NOI's to construct, reviewing and acting on preconstruction and operating permit applications, conducting enforcement activities such as inspections, reviewing pretest plans and test reports, attending tests (if desired by the agency), and reviewing reports which sources must submit to comply with their operating permits.

Agencies responsible for processing NOI's to construct and preconstruction and operating permit applications will typically perform the following activities:

- Answer respondent questions;
- Log-in and review data submissions;
- Request additional information for incomplete applications;
- Analyze requests for confidentiality and provide appropriate protection;
- Prepare completed applications for processing and approval;
- Prepare notices of public hearings on permit applications for publication in newspapers, arrange and attend public hearings, and summarize and respond to public comments;
- Submit information on BACT/LAER determinations to the EPA's BACT/LAER Clearinghouse for entry into data base.

EPA Activities

The EPA will perform reviews of new regulations adopted by State and local COA's to determine if the regulations are applicable to OCS sources. If it is determined that a new onshore regulation is applicable to OCS sources and EPA determines that the new regulation does not conflict with Federal law, then the EPA will update the OCS regulations by the incorporation of such regulation. Such an update will require formal notice in the Federal Register and opportunities for public comment. The EPA expects to allocate one-half of an FTE staff member each year for the purpose of consistency updates from September 1, 1998 through August 31, 2001.

The EPA will consult with the MMS to prepare air quality impact analyses for environmental impact statements for OCS leasing activities, and to comply with the consultation process requirement of the Endangered Species Act. However, this consultation process is not expected to increase the EPA's burden associated with the OCS program. Therefore, a burden estimate was not calculated for this activity.

4(b) COLLECTION METHODOLOGY AND MANAGEMENT

It is the responsibility of each owner and operator of an OCS source affected by the OCS regulations to prepare and submit an NOI to construct, a preconstruction permit, and/or an operating permit application to the permit reviewing authority. The permit reviewing authority will log in permit applications

and store them in a central file at the location of the permit reviewing authority. Once preconstruction permits have been approved, the permits will be submitted to the EPA's BACT/LAER Clearinghouse where control technology information will be entered into a data base. Because the preconstruction permits and associated control technology determinations are performed on a case-by-case basis, the OCS regulations will not contain forms which owners or operators will have to fill out and submit to the permit reviewing authority.

Qualified personnel that work for the permit reviewing authority will perform permit reviews and check the quality of data submitted by the applicant on a case-by-case basis. The applicant will be required to submit information on how the data were obtained (e.g., indicate whether emissions data were obtained through the use of emissions factors or test data) and how calculations were performed. The permit reviewing authority personnel will check data quality by reviewing test data and checking engineering calculations, and by reviewing control technology determinations for similar sources. The BACT/LAER Clearinghouse data base will be reviewed for information on control technology determinations made for sources similar to the sources included in a permit application. Confidential information submitted by the applicant will be handled by the permit reviewing authority's confidential information handling procedures. The public will be provided the opportunity to review a permit application by obtaining a copy of the application from the permit reviewing authority and by attending the public hearing.

The OCS regulations do not require the request of information through any type of survey.

4(c) SMALL ENTITY FLEXIBILITY

This section is not applicable because the NOI to construct, preconstruction and operating permit, annual compliance testing, recordkeeping, and reporting requirements associated with the OCS regulations do not directly affect small entities.

4(d) COLLECTION SCHEDULE

The OCS regulations were promulgated on September 4, 1992 at 57 FR 40792. Existing development/production sources are currently subject to the OCS regulations, and authority to implement and enforce the regulations for those sources has been delegated to the local air pollution control districts. Therefore, the existing development/production sources are subject to annual reporting requirements through their PTO's required by local agencies. It is not known when the new exploration sources will begin construction. For the purpose of

this analysis, it was assumed that the exploration sources that will be under the local regulatory authority would conduct activities throughout the time period covered by this ICR. For the new exploration sources that will be under the EPA's regulatory authority, it was assumed that they would complete operations before September 2001. For the new development/ production sources under EPA's regulatory authority, it was assumed that they would become operational by September 2001. However, because of the time needed to obtain a permit and construct the source, it was assume that most would not be operational until sometime in 2001.

5. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

5(a) NON-DUPLICATION

The information collection activities that will be required under the OCS regulations are not routinely required elsewhere by the EPA. However, similar information may be collected during the development of certain environmental impact statements (EIS). In such cases, regulations and policies require that information collected for EIS's and OCS programs be coordinated to the maximum extent possible to minimize duplicating the collection of data. Some of the required information may also be available from State or other Federal agencies. However, even when these data are available, they are not generally adequate to address completely the relevant requirements of the OCS regulations.

5(b) CONSULTATIONS

In developing the initial regulations, EPA held round table discussions with industry and environmental groups and with Federal, State, and local agencies. Four public hearings were held in January 1992 in Anchorage, San Francisco, Los Angeles, and Washington, D.C. Since promulgation of the regulations, EPA has continued to work with the MMS, States and local air pollution control agencies to update information.

5(c) EFFECTS OF LESS FREQUENT COLLECTION

The information required to be submitted by each preconstruction permit applicant will be submitted on a one-time-only basis. When an existing OCS source wishes to modify or expand a facility already in operation, most of the information submitted will pertain to the new construction. New development/ production sources and platforms are expected to obtain an operating permit approximately 1 year after the source commences operation. Since most of the development/production sources and platforms are not expected to commence operation until at lease 2000, it was assumed that approximately one-half of the 23

projected new development/production sources under EPA's regulatory authority would apply and/or obtain an operation permit during the 3-year time period covered by this ICR. For the new exploration sources and existing development/production sources assumed to be under the regulatory authority of local agencies, it was projected that each source would obtain its initial PTO or would renew its PTO during the 3-year time period covered by this ICR to comply with local agency regulations. The new exploration sources and existing development/production sources assumed to be under the regulatory authority of local agencies are projected to be subject to annual compliance testing, recordkeeping, and reporting requirements to demonstrate compliance with their PTO's. Less frequent collection of information than that required by these requirements would jeopardize the ability of regulatory agencies to evaluate a source's compliance with the OCS regulations.

5(d) GENERAL GUIDELINES

This ICR adheres to the guidelines stated in the 1995 Paperwork Reduction Act, the Office of Management and Budget's implementing regulations, EPA's Information Collection Request Handbook, and other applicable OMB guidance.

5(e) CONFIDENTIALITY AND SENSITIVE QUESTIONS

(i) Confidentiality

Any information submitted to the EPA for which a claim of confidentiality is made will be safeguarded according to the EPA's policies set forth in Title 40, Chapter 1, Part 2, Subpart B--Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 8, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

(ii) Sensitive Questions

This section is not applicable. This ICR does not contain any sensitive questions relating to sexual behavior or attitudes, religious beliefs, or other matters usually considered private.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) ESTIMATING RESPONDENT BURDEN AND COSTS

This section presents estimates of the burden to exploration and development/production sources associated with the OCS regulations. The respondent burden estimates are based on the

data items and respondent activities described in section 3(b) of this ICR.

All costs are presented in 1998 dollars. Except where noted, a wage rate of $45 per hour was used to calculate cost estimates from labor-hour estimates. This wage rate is based on the assumption that approximately 70 percent of the burden activities will be completed in-house, at a cost of $41 per hour, and 30 percent will be completed by consultants at a cost of $55 per hour. The $45 per hour wage rate is the wage rate used in the title V operating permits ICR. The wage rate includes direct personnel and overhead costs. Total labor hours and costs for the 3-year time period covered by this ICR and annualized costs for the 3-year time period are presented at the end of this section.

New Sources: NOI to Construct and Preconstruction Permit Applications

The new exploration sources are expected to be subject to the OCS regulations. The fifteen new exploration sources off the coast of Florida in the eastern Gulf of Mexico and the four new exploration sources off the coast of Alaska in the Beaufort Sea are assumed to be located within the 25-mile limit and subject to EPA requirements. The one exploration source off the coast of North Carolina is expected to be located beyond the 25-mile limit and not subject to the NOI requirements. However for the purposes of this ICR, it was assumed that all exploratory sources under EPA authority would have the same burden. The affected exploration sources will have to prepare a NOI to construct, but will not have to prepare preconstruction permit applications to comply with PSD requirements under part C of title I of the CAA. The four new exploration sources projected for the southern California area are expected to be located within 25 miles of California's boundary and under the regulatory authority of the local districts. These sources will have to prepare NOI’s to construct and ATC permit applications to comply with the district regulations. The sources will be subject to preconstruction permit requirements for nonattainment and attainment pollutants such as sections 3.a and 3.b of SBCAPCD's Rule 205, respectively. As discussed under section 3(b) of this ICR, section 3.a of Rule 205 contains the requirements for complying with part D of title I, and section 3.b of Rule 205 contains the requirements for complying with part C of title I of the CAA.

The respondent burden and cost estimates for the four new sources are shown in Table 6. The estimated average burden to complete the NOI/preconstruction application for each of the 19 new exploration sources which are expected to locate within the 25-mile limit and are under the EPA's regulatory authority is 40 hours and $1,800. The one exploration source locating beyond the

25 mile limit is assumed to have a similar burden. The total one-time-only burden estimate for the 20 sources combined is 800 hours and $36,000.

The 23 new development/production sources under the EPA's regulatory authority are expected to spend 685 hours and $30,825, on average, to prepare an NOI and PSD preconstruction permit application. The 685-hour per source estimate is based on an average estimate developed for sources subject to the PSD regulations. The total one-time-only burden estimate for the three sources combined is 15,755 hours and $708,975.

For the four new sources which will be under the regulatory authority of the local districts in California, it was estimated that it will take the source 80 hours and $3,600 to prepare a NOI to construct and an ATC permit application for both the nonattainment and attainment pollutants. The 80-hour estimate includes 40 hours for preparing the NOI to construct and ATC permit application, plus 40 hours to document emissions offsets. It was assumed that the company which owns or operates the source will obtain emissions offsets from other sources owned or operated by the company. The burden associated with preparing preconstruction permits for exploration sources was estimated to be significantly lower than the burden for development/production sources because exploration sources have significantly fewer emission sources than development/production sources. Also, the OCS regulations automatically designate the NOA as the COA for exploration sources which eliminates the need for exploration sources to assess air pollution impacts on onshore areas other than the NOA. The total one-time-only burden estimate for the three sources combined is 320 hours and $14,400.

New Sources: Operating Permits

The four new exploration sources that were assumed to be under the regulatory authority of the local districts will receive their PTO in conjunction with their NSR permits. According to the SBCAPCD, recordkeeping and reporting requirements are added to a source's ATC permit which is then converted to the source's PTO when the source is ready to become operational. Therefore, the owner or operator of an exploration source will not have to prepare a PTO application containing additional information from its ATC permit and recordkeeping and reporting requirements determined by the SBCAPCD. Therefore, no additional burden associated with preparing a PTO was assumed.

Because of their short period of operation and the size of the sources, exploration sources that expected to be under the EPA's regulatory authority would not require a separate operating permit.

For the 23 new development/production sources that will be under the EPA's regulatory authority, the burden associated with preparing a title V operating permit application is estimated to be 40 hours and $1,800. Because of the time required to obtain a permit and construct the OCS facilities and since a new source permit allows a source to operate for a period of time before an operating permit is required, it is assumed that only 11 of the 23 sources will apply for their title V operating permit during the time period covered by this ICR. The total one-time-only burden estimated for the 23 development/production sources is 440 hours and $19,800.

Existing Sources: Operating Permits

For the 27 existing development/production sources in the southern California area, it was estimated that it will take each source 320 hours and $14,400 to renew a PTO. The 320-hour estimate is based on an estimate used in the regulatory impact analysis for estimating the burden associated with preparing title V operating permits for large sources.[10] The estimate includes the time needed to read and interpret regulations for preparing the PTO application, preparing data and information needed for the PTO, preparing and submitting the application, responding to any questions from staff members of the regulatory authority, and performing any other tasks needed to obtain approval of its PTO application. The total periodic burden estimated for all 27 sources combined is 8,640 hours and $388,800.

Existing and New Sources: Compliance Testing

Table 7 shows the labor-hour and cost estimates for performing emission tests on turbines and internal combustion engines. It was assumed that Reference Method 20 would be used to test turbines for nitrogen oxide emissions. For internal combustion engines, it was assumed that the instrumental methods of Reference Methods 3A, 6C, and 7E using the electro-chemical cell methodology would be used to test for nitrogen oxide, carbon monoxide, hydrocarbon, and sulfur dioxide emissions. Table 7 shows the burden estimates for completing the first test on one turbine or engine, and the burden for completing subsequent tests on each turbine or engine at the same location. The burden associated with the first test includes travel and set-up costs which are not included in the burden for subsequent tests. The labor-hour estimates were provided by the EPA's Emission Measurement Branch of the Office of Air Quality Planning and

[10] Reference: Regulatory Impact Analysis and Regulatory Flexibility Act Screening for Operating Permits Regulations. U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Research Triangle Park, NC. Publication No. EPA-450/2-91-011. June 1992.

Standards. Technical labor costs were based on $45 per hour. Management labor was assumed to be 5 percent of technical labor hours at a wage rate of $67 per hour. Clerical labor was assumed to be 10 percent of technical labor hours at a wage rate of $20 per hour. The distribution between technical, management, and clerical labor-hour and cost estimates are based on guidance provided by the Emission Standards Division Regulatory Procedures Manual published by the EPA's Office of Air Quality Planning and Standards. The weighted average labor-rate for compliance testing was $43.80 per hour. Burden estimates associated with performing a Reference Method 21 test to measure volatile organic compound emissions from equipment leaks were included in the control cost estimates for the regulatory impact analysis (RIA) for the OCS air regulations; therefore, this burden was not estimated for the ICR.[3] Since no new platforms are projected to be constructed during the time period for the ICR, there is no cost for the initial compliance test for development/production sources.

The model for a new platform developed for use in the RIA for the OCS air regulations estimates the initial compliance testing burden for new development/production sources that would be under the EPA's regulatory authority.[11] The model platform included five turbines and three internal combustion engines. The total burden associated with performing initial compliance tests on five turbines and three engines is estimated to be 720 hours and $31,540. In addition, it was assumed that 20 percent of the sources would fail some of the initial compliance tests on turbines and/or engines and would need to retest to demonstrate compliance. The failure rate accounts for improper performance of emission control techniques which must be corrected to pass a compliance test, process upsets during testing, and failures in emission testing equipment. The 20 percent failure rate is based on guidance provided by the Emission Standards Division Regulatory Procedures Manual published by the EPA's Office of Air Quality Planning and Standards. The total one-time-only initial compliance testing burden (including retests) for the 23 sources was estimated to be 19,872 hours and $870,486.

For the four new exploration sources that would be under the regulatory authority of the local districts, it was assumed that the exploration vessels would have five internal combustion engines that would be subject to compliance testing. The compliance testing burden for the sources is estimated to be 250 hours and $10,950 per year. In addition, it was assumed that 20 percent of the sources would fail some of the initial compliance

[11]The compliance testing burden estimates for new development/production and exploration sources are presented in a memorandum from Strait, R., Alliance Technologies Corporation, to Swanson, J., U.S. Environmental Protection Agency. June 15, 1992.

tests on turbines and/or engines and would need to retest to demonstrate compliance. The failure rate accounts for improper performance of emission control techniques which must be corrected to pass a compliance test, process upsets during testing, and failures in emission testing equipment. The 20 percent failure rate is based on guidance provided by the Emission Standards Division Regulatory Procedures Manual published by the EPA's Office of Air Quality Planning and Standards. The total 3-year annual compliance testing burden (including retests) for the exploration sources was estimated to be 1200 hours and $52,560.[12]

Information on the number of turbines and internal combustion engines was available for 20 of the 27 existing development/production sources. Therefore, the annual compliance testing burden was estimated for each of the 20 sources. The compliance testing burden for each of the seven sources for which information was not available was based on the average compliance testing burden calculated for the 20 sources. This average compliance testing burden was estimated to be 450 hours and $19,710 per source. This estimate is lower than the estimate for new development/production sources because the model for the new platform contained more turbines and engines than the average number of turbines and engines for the 20 existing development/production sources. For example, some of the existing sources did not have turbines because they are supplied with power from onshore sources or other existing development/ production sources. A 20 percent retest rate was also calculated for existing development/production sources. It was assumed that the 27 existing development/production sources would perform annual compliance tests. The total 3-year annual compliance testing burden (including retests) for the 27 sources was estimated to be 43,740 hours and $1,915,812.[13]

In summary, the total annual compliance testing burden (including retests) for the four new exploration and 27 existing development/production sources under the regulatory authority of local agencies is estimated to be 44,940 hours and $1,968,372.

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[12] The compliance testing burden estimates for new development/production and exploration sources are presented in a memorandum from Strait, R., Alliance Technologies Corporation, to Swanson, J., U.S. Environmental Protection Agency. June 15, 1992. These numbers were adjusted based upon the new information on the number of sources provided by the Mineral Management Service.

[13] The compliance testing burden estimates for existing development/production sources are presented in a memorandum from Strait, R., Alliance Technologies Corporation, to Swanson, J., U.S. Environmental Protection Agency. June 10, 1992.

Existing and New Sources: Recordkeeping and Reporting

The burden for an existing or new development/production source to comply with the recordkeeping and reporting requirements contained in its PTO, or title V operating permit is estimated to be 64 hours and $2,880 per year. The 64-hour estimate is based on an estimate used in the RIA for estimating the burden associated with preparing title V operating permits for large sources.[12] The total annual burden estimate for the 27 existing sources combined is 1,728 hours and $77,760. The total burden estimate for the 3-year period is 5,184 hours and $233,280. The average recordkeeping period for the 23 new development/production sources projected to be under EPA regulatory authority is assumed to be 1 year (most sources will not be able to obtain their permits and complete construction until the last year of the time period covered by this ICR). The total annual burden estimated for the 23 new development/ production sources is 491 and $22,080.

The SBCAPCD's Rule 202 requires exploration sources to record in a log book daily fuel use associated with drilling each well, and to submit the log book to the SBCAPCD within 60 days after drilling has been terminated. For the purpose of this analysis, it was assumed that the recordkeeping and reporting burden for an exploration source would be the same as the recordkeeping and reporting burden for a development/production source. However, the exploration sources only operate from 2 to 6 months, therefore, an average operational period of 6 months was assumed. The total 3-year recordkeeping and reporting burden estimate for the new exploration sources that will be under the regulatory authority of the local districts is 128 hours and $5,760.

The recordkeeping and reporting burden for the new exploration sources that will be under the EPA's regulatory authority was also estimated to be 64 hours and $2,880 per source per year. The total 3-year burden is estimated to be 640 hours and $28,800.

Total Industry Respondent Burden and Costs

The total industry respondent burden from September 1, 1998 through August 31, 2001 is shown in Table 8. Total labor hours and costs associated with one-time/periodic activities are estimated to be 50,227 hours and $2,233,129, respectively. Total labor hours and costs associated with annual activities from September 1, 1998 through August 31, 2001 are estimated to be 48,924 hours and $2,149,092, respectively. Table 8 also shows the number of sources affected by each burden activity, the burden per source associated with each activity, and the number of occurrences per source during the 3-year time period.

Total industry respondent costs annualized over the 3-year time period are estimated to be $1,775,646 per year. The method used to develop the annualized-cost estimate is as follows:

- Total one-time/periodic costs were annualized over 3 years yielding an annual cost of $889,980 per year. One-time-only costs were annualized instead of discounted to present value because it is not known when the costs will occur during the 3 years. Total one-time/periodic costs for the 3-year period were annualized by multiplying total one-time-periodic costs by a factor of 0.4021. The factor was calculated using the following formula:

  $$i\,(1 + i)^n / ((1 + i)^n - 1)$$

  Where: i = 10 percent interest rate, n = 3 years

- The annual costs are also shown in table 8. For each year, the annual costs are $716,364. The total annual costs are $2,149,092.

- A discount rate was used to calculate the present value of the total costs for each year. Discount rates were calculated for each year using the following formula:

  $$1 / (1 + i)^n$$

  Where: i = 10 percent discount rate, n = number of years being discounted back to 1998

The discount rates are as follows:

Year	n	Discount Rate
1998-1999	0	1.0000
1999-2000	1	0.9091
2000-2001	2	0.8264

- The present values for all 3 years were then summed (yielding a total present value of $4,415,932 and the sum was annualized (using the formula above) to calculate total 3-year costs. Total 3-year annualized costs were estimated to be $1,775,646.

6(b) ESTIMATING STATE AND LOCAL AIR POLLUTION CONTROL AGENCY BURDEN AND COSTS

This section presents estimates of the burden to State and local agencies associated with the OCS regulations. The burden estimates are based on the data items and respondent activities described in section 4(a) of this ICR.

All costs are presented in 1998 dollars. A wage rate of $34 per hour was used to calculate cost estimates from labor-hour estimates. This wage rate is based on the Federal wage rate at the Grade 11, Step 3, level pay schedule. The wage rate includes direct personnel and overhead costs. Total labor hours and costs for the 3-year time period covered by this ICR, as well as annualized costs for the 3-year time period, are presented at the end of this section.

Prepare Delegation Requests

The EPA has delegated the authority to implement and enforce the OCS regulations to four local air pollution control districts in California (SBCAPCD, SCAQMD, VCAPCD, SLOCAPCD). No additional delegation requests are expected during the period September 1, 1998 to August 31, 2001.

New Sources: NOI to Construct and Preconstruction Permit Applications

Table 6 shows the labor-hour and cost estimates for the local districts to process a NOI to construct and a preconstruction permit application for the three new exploration sources which will be under its regulatory authority. It was estimated that it will take local district personnel 60 hours and $2,040 to review and approve the NOI to construct and an ATC permit application for each new exploratory source. The 60-hour estimate includes 40 hours for reviewing the NOI and ATC permit application plus 20 hours for reviewing documentation of emissions offsets. The total 3-year burden estimate for the four new sources is 240 hours and $8,160.

Existing and New Sources: Operating Permit Applications

The local agencies have regulatory authority over the 27 existing development/production sources located in the southern California area and require these sources to obtain PTO's. It is assumed that these sources will renew their PTO's during the time period covered by this ICR to comply with local agency regulations. The four new exploration sources are assumed to obtain PTO’s in conjunction with their NSR permit and will not need to renew their permit. For each existing source, it is estimated that it will take 40 hours and $1,360 for one staff

member of a local agency to answer questions when a source prepares the PTO application, review the PTO application, provide for public notice and comment on the application, and take final action on the application. The total periodic burden associated with processing PTO applications for the 27 existing development/ production sources over the 3-year time period covered by this ICR is estimated to be 1,080 hours and $36,720.

Oversee/Attend Compliance Tests at Existing and New Sources

It is estimated that it will take about 56 hours and $1,904 for one staff person to oversee and attend a compliance test. This estimate is based on the following assumptions:

- 4 hours to review the pretest plan and prepare comments, if necessary;

- 48 hours to attend each test (This estimate is based on an average estimate which includes 14 hours/day at the test site for 3 days plus 2 hours of round-trip travel time each day to the test site. It was assumed that the staff person would use the source's ferry service at no charge for transportation to and from the test site.);

- 4 hours to review the test report.

In addition, it was assumed that 20 percent of the sources would fail some of the compliance tests on turbines and/or engines and would need to retest to demonstrate compliance, and that agency personnel would attend 10 percent of the retests. The failure rate accounts for improper performance of emission control techniques which must be corrected to pass a compliance test, process upsets during testing, and failures in emission testing equipment. The 20 percent failure rate is based on guidance provided by the Emission Standards Division Regulatory Procedures Manual published by the EPA's Office of Air Quality Planning and Standards.

The total annual burden (including retests) to local agencies associated with overseeing and attending annual compliance tests at the 27 existing sources is estimated to be 1,542 hours and $52,436 per year. The total burden to local agencies for the 3-year time period is estimated to be 4,626 hours and $157,308. The total burden to the local districts associated with overseeing and attending annual compliance tests at the new exploration sources for the 3-year time period is estimated to be 228 hours and $7,768.

Inspections of Existing and New Sources

The SBCAPCD has indicated that they would conduct, at a minimum, quarterly inspections of exploration and development/ production sources under their regulatory authority.[14] For the purpose of this analysis, it was assumed that the local air pollution control agencies in the southern California planning area would complete quarterly inspections at each of the 27 existing sources. In addition, the local agency would inspect each of the four new exploration source twice during the time period covered by this ICR. It was assumed that each inspection would take 16 hours and $544. The 16-hour estimate includes 8 hours to conduct the inspection (including round-trip travel time using the development/production source's ferry service) and 8 hours to write the inspection report. The total burden for the 3-year time period is estimated to be 5,184 hours and $176,256. For the four exploration sources, the total 3-year burden is estimated to be 128 hours and $4,352.

Existing and New Sources: Review Reports

The 27 existing sources under the regulatory authority of local agencies have certain reporting requirements in their PTO's. However, these reporting requirements vary with the individual PTO's. For the purpose of this analysis, it was assumed that it would take about 8 hours of staff time for a local agency to review records submitted by a source, to ask questions about the records, and to log and file the records. The annual agency burden estimate associated with reporting activities for the 27 sources is 216 hours and $7,344. The total 3-year agency burden estimate for the 27 sources is 648 hours and $22,032.

The SBCAPCD's Rule 202 requires exploration sources to submit a log book containing records of daily fuel use within 60 days after completing the drilling of a well. The burden to the SBCAPCD associated with reviewing information contained in the log books is estimated to take 8 hours and $272 per log book. This estimate includes time to review the data, ask questions about the data, and log the information into agency files. Based on MMS projections it was assumed that four exploration wells would be drilled in the southern California planning area from 1998 to 2001. It is assumed that each exploration source will submit a log book during the 3-year time period covered by this ICR. Therefore, the total 3-year burden associated with this activity is estimated to be 32 hours and $1,088.

[14]Reference: Telecom. Strait, R., Alliance Technologies Corporation, with Economus, G., SBCAPCD. August 23, 1991. Information provided on the burden associated with conducting inspections of OCS sources.

Total State and Local Agency Burden and Costs

The total State and local agency burden from September 1998 to August 2001 is shown in Table 9. Total labor hours and costs associated with one-time/periodic activities are estimated to be 1,868 hours and $63,528, respectively. Total labor hours and costs associated with annual activities for that time period are estimated to be 10,458 hours and $355,596, respectively. Table 9 also shows the number of agencies and sources affected by each burden activity, the burden per agency or source associated with each activity, and the number of occurrences per agency or source during the 3-year time period.

Total costs annualized over the 3-year time period are estimated to be $158,476 per year. The method used to develop the annualized-cost estimate is the same method used above for calculating total annualized costs for industry respondents.

6(c) ESTIMATING THE EPA BURDEN AND COSTS

This section presents estimates of the burden to the EPA associated with the OCS regulations. The burden estimates are based on the data items and respondent activities described in section 4(a) of this ICR.

All costs are presented in 1998 dollars. A wage rate of $34 per hour was used to calculate cost estimates from labor-hour estimates. This wage rate is based on the Federal wage rate at the Grade 11, Step 3, level pay schedule. The wage rate includes direct personnel and overhead costs. Total labor hours and costs for the 3-year time period covered by this ICR and annualized costs for the 3-year time period are presented at the end of this section.

Review/Act On Delegation Requests

The EPA has delegated authority to implement and enforce the OCS regulations to four local districts in California and does not expect any additional delegation requests during the time period covered by this ICR. Therefore, there is no burden associated with the processing of delegation requests for the 3-year time period covered by this ICR.

New Sources: NOI to Construct and Applications

The 20 new exploration sources which will be under the regulatory authority of the EPA will be required to prepare and submit NOI to construct/applications before they begin operation. For each source, it is estimated that it will take 40 hours and $1,360 for one EPA staff member to answer questions when a source prepares its NOI to construct/application, review the

application, provide for public notice and comment on the application, and take final action on the application. The total burden associated with processing operating permit applications over the 3-year time period covered by this ICR is estimated to be 800 hours and $27,200.

New Sources: Preconstruction Permit Applications

The labor-hour and cost estimates for the EPA to process preconstruction permit applications for the 23 new development/ production sources are shown in Table 6. It is estimated that it will take 268 hours, on the average, for EPA personnel to process a PSD preconstruction permit application. The 268-hour per source estimate is based on an average estimate developed for permit reviewing authorities which review and approve PSD preconstruction permit applications. The total 3-year burden associated with this one-time-only activity is estimated to be 6164 hours and $209,576.

An additional 160 hours was added to the EPA burden to account for the time it will take EPA personnel to review the preconstruction permit application for the four new exploration sources that will be under the regulatory authority of the local districts. It is assumed that the SBCAPCD will submit its preconstruction permit applications to the EPA for review and approval before the applications can be finalized. The burden associated with this one-time-only activity is estimated to be 160 hours and $5,440 per source.

Oversee/Attend Initial Compliance Tests at New Sources

The EPA will be responsible for overseeing and attending initial compliance tests for the three development/production sources. It was estimated that it will take about 56 hours and $1,904 for a staff person to oversee and attend a compliance test. This estimate is based on the same assumptions presented above for State and local agencies to oversee and attend compliance tests. The total one-time-only burden (including retests) is estimated to be 1,314 hours and $44,676.

New Sources: Operating Permit Applications

For 23 new development/production sources that will be under the EPA's regulatory authority, the burden associated with reviewing a title V operating permit application is estimated to be 40 hours and $1,360 for one EPA staff member to answer questions when a source prepares the permit application, review the PTO application, provide for public notice and comment on the application, and take final action on it. Because of the time required to obtain a permit and construct the OCS facilities and since a new source permit allows a source to operate for a period

of time before an operating permit is required, it is assumed that only 11 of the 23 sources will apply for their title V operating permit during the time period covered by this ICR. The total periodic burden associated with processing the operating permit applications for the 23 new development/production sources over the 3-year time period covered by this ICR is estimated to be 440 hours and $14,960.

New Sources: Review Reports

The 20 new exploration sources which will be under the regulatory authority of the EPA will have certain reporting requirements. However, it is not clear what these reporting requirements will be until the permits have been issued to the sources. For the purpose of this analysis, it was assumed that it would take 8 hours of EPA staff time to review records submitted by a source, to ask questions about the records, and to log and file the records. The 3-year burden associated with reviewing records submitted by the 20 sources is estimated to be 160 hours and $5,440.

The 23 new development/production sources which will be under the regulatory authority of the EPA will have certain reporting requirements. However, it is not clear what these reporting requirements will be until the permits have been issued to the sources. For the purpose of this analysis, it was assumed that it would take 8 hours of EPA staff time to review records submitted by a source, to ask questions about the records, and to log and file the records. The 3-year burden associated with reviewing records submitted by the 20 sources is estimated to be 184 hours and $6,256.

Consistency Updates of OCS Regulations

The EPA expects that consistency update reviews will require the time of 0.5 FTE staff members each year. As one FTE is equivalent to 2,080 hours and $70,720, the total labor hours associated with this burden item are estimated to be 1,040 hours and $35,360 per year. The total 3-year burden is estimated to be 3,120 hours and $106,080.

Total EPA Burden and Costs

The total EPA burden from September 1, 1998 to August 31, 2001 is shown in Table 10. Total labor hours and costs associated with one-time-only activities are estimated to be 9,038 hours and $307,292, respectively. Total labor hours and costs associated with annual activities from September 1, 1998 through August 31, 2001 are estimated to be 3,304 hours and $112,336, respectively. Table 10 also shows the number of

agencies and sources affected by each burden activity, the EPA burden per agency or source associated with each burden activity, and the number of occurrences per agency or source during the 3-year time period.

Total costs annualized over the 3-year time period are estimated to be $177,099 per year. The method used to develop the annualized-cost estimate is the same method used above for calculating total annualized costs for industry respondents.

6(d) REASONS FOR CHANGE IN BURDEN

The MMS has projected a significant increase in the number of OCS facilities being constructed during the next 3 years than were estimated at the time of the original ICR. In addition, the estimated time for the consistency updates conducted by EPA has been reduced based on experience of conducting the updates.

TABLE 1. REFERENCES FOR BURDEN ACTIVITIES ASSOCIATED WITH OCS AIR REGULATIONS

Applicable Sections of OCS Air Regulations	Burden Activities
55.4	Requirements to Submit a Notice of Intent
55.5	Corresponding Onshore Area Designation
55.6	Permit Requirements
55.8	Monitoring, Reporting, Inspections, and Compliance
55.9	Enforcement
55.11	Delegation
55.12	Consistency Updates
55.13	Federal Requirements that Apply to OCS Sources
55.14	Federal, State, and Local Requirements that Apply to OCS Sources Located Within 25 Miles of States' Seaward Boundaries, by State

TABLE 2. NUMBER OF OCS SOURCES ESTIMATED FOR 1998 TO 2001

Location of Sources	Implementing Agency[b]	Existing	Number of New Sources[a]	
			Exploration Vessels	Construction and Development/ Production
Mid and South Atlantic	EPA	0	1	0
Eastern Gulf of Mexico	EPA	0	15	23
Southern California	Local Districts	27	3 to 4	0
Alaska	EPA	0	4	1

[a] The reference used to estimate the number of new sources is: Memorandum from Herkhof d., MMS, to Stonefield D., EPA. March 6, 1998. Projected OCS Activities for the Period 1998-2001.

[b] The EPA is responsible for implementing and enforcing OCS regulations in all locations shown except for the Southern California OCS planning area where the local air pollution control districts have been delegated the authority to implement and enforce OCS regulations.

TABLE 3. RESPONDENT DATA AND INFORMATION REQUIREMENTS FOR PREPARING PSD CONSTRUCTION PERMITS

Requirements	Current Regulation Reference 40 CFR	CAA Reference
Description of the nature, location, design capacity, and typical operating schedule	51.166(n)(2)(i) [52.21(n)(1)(i)]	110(a)(2)(A)
Detailed schedule for construction	51.166(n)(2)(ii) [52.21(n)(1)(ii)]	110(a)(2)(A)
Description of continuous emission reduction system, emission estimates, and other information needed to determine that BACT is used	51.166(n)(2)(iii) [52.21(n)(1)(iii)]	165(a)(4)
Air quality impact, meteorological, and topographical data	51.166(n)(3)(i) [52.21(n)(2)(i)]	165(a)(3)
Nature and extent of general commercial, residential, industrial, and other growth in area of source	51.166(n)(3)(ii) [52.21(n)(2)(ii)]	165(a)(6)
Use of air quality models to demonstrate compliance with NAAQS	51.166(k)&(l) [52.21(k)&(l)]	165(a)(3)&(e)(3)(D)
Information necessary to determine adverse impacts on any air quality related values (including visibility) for Federal Class I areas	51.166(o) [52.21(o)] 51.166(p)(4) [52.21(p)(5)]	165(a)(5) 165(d)(2)(C)(iii)& (iv)
Air quality monitoring data	51.166(m)(1)(b) [52.21(m)(1)(b)]	165(a)(7) 110(a)(2)(B)&(F)
Impairment of visibility, soils, and vegetation	51.166(o)(1) [52.21(o)(1)]	165(e)(3)
Air quality impact resulting from general commercial, residential, industrial, and other growth associated with source	51.166(o)(2) [52.21(o)(2)]	165(e)(3)
Written notice of proposed relocation of portable source	51.166(i)(4)(iii)(d) [52.21(i)(4)(viii)]	301
Description of the location, design construction, and operation of building, structure, facility, or installation	51.160(c)(2)	110(a)(2)(A)
Description of the nature and amounts of emissions to be emitted	51.160(c)(1)	110(a)(2)(F)(ii)
Description of the air quality data and dispersion or other air quality modeling used	51.160(f)	110(a)(2)(B)&(K)

Sufficient information to ensure attainment and maintenance of NAAQS	51.160(c)-(e) 51.161 51.162 51.163	110(a)(2)(A)

TABLE 4. RESPONDENT DATA AND INFORMATION REQUIREMENTS FOR PREPARING PART D CONSTRUCTION PERMITS

Requirements	Regulation Reference 40 CFR	CAA Reference
Documentation that LAER is being applied	51.165(a)(2)	173(2)
Documentation that all sources owned or operated by same person are in compliance	51.165(a)(2)	173(3)
Documentation that sufficient emissions reductions are occurring to ensure reasonable further progress (RFP)	51.165(a)(2)	173(1)
Documentation that benefits of proposed source significantly outweigh the environmental and social costs imposed as a result of its location, construction, or modification	- - -	173(a)(5)
Description of the location, design construction, and operation of building, structure, facility, or installation	51.160(c)(2)	110(a)(2)(A)
Description of the nature and amounts of emissions to be emitted	51.160(c)(1)	110(a)(2)(F)(ii)
Description of the air quality data and dispersion or other air quality modeling used	51.160(f)	110(a)(2)(B)&(K)
Sufficient information to ensure attainment and maintenance of NAAQS	51.160(c)-(e) 51.161 51.162 51.163	110(a)(2)(A) 172(c)(6)

TABLE 5. RESPONDENT DATA FOR ATC PERMITS REQUIRED BY RULE 201 OF THE SBCAPCD'S AIR POLLUTION REGULATIONS

Paragraph C.4. Information Required - General

a. A schematic of the basic equipment and control equipment showing:
   1) Electric motors and horsepower.
   2) Capacity or dimensions of any storage vessels.
   3) Manufacturer, model, and Btu rating of any burners.
b. Normal operating hours.
c. Raw material usage.

Paragraph C.5. Information Required - Best Available Control Technology

a. Scaled and dimensioned plot plan or facility which shows and identifies the locations of:
   1) Public and private streets.
   2) Property lines.
   3) Existing and proposed buildings (indicate their heights).
   4) Adjacent property owners and uses.
   5) Storage areas for fuel, materials and products.
   6) Basic, control and air monitoring equipment.
   7) Piping and ducts for carrying fuels, products and possible sources of air pollutants.
   8) Points of emissions.
b. Detailed schematic of basic equipment and control equipment and listing of:
   1) Electric motor-driven equipment and horsepower. Also list equipment driven by other prime movers such as steam or heat engines.
   2) Vessels with capacity and dimensions.
   3) Pumps and compressors. Give manufacturer, model, type and type of gland seal used.
   4) Burners, manufacturer, model, Btu rating, mode of atomization, mode of control (manual, high-low, etc.), firing type (tangential, opposed, front, etc.), fuel type and temperature and excess air used.
   5) Air pollution control equipment showing manufacturer, model and type. Include horsepower or any prime movers.
   6) Automatic control equipment and principal instrumentation.
c. Description of Operation
   1) Time - hours/day, days/week, days/year. State season or time when plant will not be in operation.
   2) Loads - Provide tabulation showing:
      a) Hourly raw material usage, fuel usage, electrical usage, rate of production, rate of emission of pollutants and stack gases at maximum design capacity and at 'normal' working level.
      b) Estimated annual totals in tons/year.
      c) Provide particle size distribution and other pertinent physical and chemical properties of emissions.
   3) Include pressures, temperatures (including stack temperatures) and sequences.
   4) For burners, provide manufacturer and model and mention excess air, fuel preheating and atomization mode, type of fuel, and type of controls used to ensure efficient combustion. When oil tanks are used, schematic with relief valve settings and vapor pressure at storage temperature.
   5) Describe and estimate fugitive emissions incidental to the plant and its operation.

(continued)

TABLE 5. RESPONDENT DATA FOR ATC PERMITS REQUIRED BY RULE 201 OF THE SBCAPCD'S AIR POLLUTION REGULATIONS (continued)

Paragraph C.6. Information Required - Air Quality Impact Analysis

a. Any monitoring stations that may be installed by applicant.
b. Sufficient data to perform an impact analysis from all emission points and fugitive emissions.
   1) Meteorological data.
   2) Topographical data.
   3) Air quality data.
   4) Computer modeling data, including assumptions that should be made.
c. Identify all facilities within the air basin that are owned or operated by the applicant and the compliance status of each.
d. Power Consumption of Facility
   1) Total amount of electrical power to be consumed by the new facility or the increase in the amount of electrical power to be consumed due to the modification.
   2) Percentage of electrical power provided by off-site generating facilities; identify the source of power.
e. Cargo Carriers
   List the frequency of visits, describe types and sizes of all cargo carriers (other than motor vehicles), identify nature of cargo, and conditions under which the cargo is transferred.
f. If applicant is applying for trade-offs from other existing sources, provide sufficient information to determine whether adequate emission reductions will be achieved to offset the air quality impacts of the applicant's source (e.g., name and location of trade-off sources and of how the emission trade-offs will be effected).
g. List proposed mitigating measures:
   1) Air pollution control equipment proposed.
   2) Process changes or operations utilized to reduce emissions.
   3) Other.
h. Identify any air quality impacts from the following precursor-secondary pollutant relationships.

Precursors		Secondary Pollutants
Hydrocarbons and substituted Photochemical oxidant (ozone) hydrocarbons (reactive organic gases)	a)	Ozone
	b)	The organic fraction of suspended particulate matter
Nitrogen oxides (NO_x)	a)	Nitrogen dioxide (NO_2)
	b)	The nitrate fraction of suspended particulate matter
Sulfur oxides (SO_x)	a)	Sulfur dioxide (SO_2)
	b)	Sulfates (SO_4)
	c)	The sulfate fraction of suspended particulate matter

"Precursors" means a directly-emitted pollutant that, when released to the atmosphere, forms or causes to be formed or contributes to the formation of a secondary pollutant for which an ambient air quality standard has been adopted, or whose presence in the atmosphere will contribute to the violation of one or more ambient air quality standards.

TABLE 6. BURDEN ESTIMATES ASSOCIATED WITH NOI TO CONSTRUCT AND PRECONSTRUCTION PERMIT ACTIVITIES FROM SEPTEMBER 1998 TO AUGUST 2001

	NOI & Part D Permits	NOI & PSD Permits	Totals
Industry Respondent Burden			
! Exploration Sources	4[a]	20	24
! Hours/Source	80	40	
! Total Hours	320	800	1120
! Labor Rates, $/hour[b]	$45.00	$45.00	
! Total Costs	$14,400	$36,000	$50,400
! Development/ Production. Sources	0	23	23
! Hours/Source		685	
! Total Hours		15,755	15,755
! Labor Rates, $/hour[b]		$45.00	
! Total Costs		$708,975	$708,975
Local Air Pollution Control Districts[c]			
! No. of Sources	4	0	4
! Hours/Source	60		
! Total Hours	240		240
! Labor Rate, $/hour[b]	$34.00		
! Total Costs	$8,160		$8,160
U.S. EPA[c]			
! Exploration Sources	4	20	24
! Hours/Source	40	40	
! Total Hours	160	800	960
! Labor Rate, $/hour[b]	$34.00	$34.00	
! Total Costs	$5,440	$27,200	$32,640
! Development/ Production Sources		23	23
! Hours/Source		268	
! Total Hours		6164	6164

	NOI & Part D Permits	NOI & PSD Permits	Totals
Industry Respondent Burden			
! Labor Rate, $/hour[b]		$34.00	
! Total Costs		$209,576	$209,576

[a] These sources will be under the regulatory authority of the local air pollution control districts. The paperwork burden to the source includes preparing an NOI to construct, collecting and analyzing data, performing analyses to demonstrate application of lowest achievable emission rate technology, performing air quality impact analyses, obtaining emissions offsets, preparing the preconstruction permit application, attending a public hearing, responding to questions asked by the permitting authority, and responding to public comments. The source will also be subject to the local district's PSD requirements for attainment pollutants. The burden associated with complying with the PSD requirements has been included in the burden estimates shown in the Part D column of this table. For estimating the burden it was assumed that the sources would have to comply with regulation similar to the requirements for SBCAPCD.

[b] The wage rates include direct personnel and overhead costs.

[c] The paperwork burden to local agencies and the U.S. EPA includes reviewing NOI's and permit applications, providing technical guidance for preparing NOI's and permit applications, and setting up and attending public hearings.

TABLE 7. RESPONDENT BURDEN ESTIMATES FOR COMPLETING COMPLIANCE TESTS ON TURBINES AND INTERNAL COMBUSTION (I/C) ENGINES

Activity	Reference Method 20 for Turbines[a]		Reference Methods 3A, 6C, and 7E for I/C Engines[b]	
	First test	Subsequent tests[c]	First test	Subsequent tests[c]
Technical Labor				
! Prepare pretest plan[d]	20	10	4	2
! Calibrate equipment/perform test	100	62	16	12
! Analyze samples, reduce data, write report	50	30	60	20
! Total technical hours	170	102	80	34
! Total technical costs ($45/hour)	$7,650	$4,590	$3,600	$1,530
Management Labor				
! Hours[e]	9	5	4	2
! Costs ($67/hour)	$603	$335	$268	$134
Clerical Labor				
! Hours[f]	17	10	8	3
! Costs ($20/hour)	$340	$200	$160	$60
Total Labor Hours	**196**	**117**	**92**	**39**
Total Labor Costs	**$8,593**	**$5,125**	**$4,028**	**$1,724**

[a] Test for nitrogen oxide emissions.

[b] Based on the use of the electro-chemical cell methodology to test for nitrogen oxide, carbon monoxide, hydrocarbon, and sulfur dioxide emissions.

[c] Hours are for completing a test on one turbine or I/C engine.

[d] Includes time associated with responding to EPA comments on the pretest plan.

[e] Five percent of total technical labor. Management hours are rounded values.

[f] Ten percent of total technical labor. Clerical hours are rounded values.

TABLE 8. TOTAL THREE-YEAR AND ANNUALIZED BURDEN ESTIMATES FOR INDUSTRY RESPONDENTS

Burden Activity	Total Number of Sources Affected (A)	Burden/Source		Number of Occurrences/Source During Three-Year Period (D)	Total Three-Year Burden	
		Labor-hours (B)	Costs (C)		Labor-hours (AxBxD)	Costs (AxCxD)
One-Time/Periodic						
New Exploration Sources Under EPA Regulatory Authority						
! Prepare NOI/permit application						
! Exploration sources	20[a]	40	$1,800	1	800	$36,000
! Development/production sources	23[b]	40	$1,800	1	920	$41,400
! Prepare preconstruction permit application						
! Development/production sources	23[b]	685	$30,825	1	15,755	$708,975
! Perform initial compliance tests						
! Development/production sources	23[b]	720	$31,536	1	16,560	$725,328
! Perform initial compliance test retests						
! Development/production sources	4.6[c]	720	$31,536	1	3,312	$145,066
! Prepare permit to operate application	11[d]	40	$31,536	1	440	$41,400
! Recordkeeping and reporting						
! Exploration sources	20[a]	64	$2,880	0.5[e]	640	$28,800
! Development/production sources	23[b]	64	$2,880	1	1,472	$66,240
New and Existing Sources Under Local Agency Regulatory Authority[a]						
! New exploration sources						
! Prepare NOI/preconstruction permit application	4[f]	80	$3,600	1	360	$14,400
! Perform initial compliance tests	4[f]	250	$10,950	1	1000	$43,800
! Perform initial compliance test retests	0.8[c]	250	$10,950	1	200	$8,760
! Recordkeeping and reporting	4[f]	64	$2,880	0.5[e]	128	$5,760
! Existing development/production sources						
! Prepare permit to operate application	27[g]	320	$14,400	1	8,640	$388,800

Burden Activity	Total Number of Sources Affected (A)	Burden/Source		Number of Occurrences/Source During Three-Year Period (D)	Total Three-Year Burden	
		Labor-hours (B)	Costs (C)		Labor-hours (AxBxD)	Costs (AxCxD)
One-Time/Periodic						
Subtotals					50,227	$2,233,129
Annual						
Existing Sources Under Local Agency Regulatory Authority						
! Perform annual compliance tests	27[g]	450	$19,710	3	36,450	$1,596,510
! Perform annual compliance test retests	5.4[c]	450	$19,710	3	7290	$319,302
! Recordkeeping and reporting	27[g]	64	$2,880	3	5,184	$233,280
Subtotals					48,924	$2,149,092
Total Three-Year Annualized Costs[h]					-------	**$1,775,646**

[a] Number of new exploration sources projected to occur in OCS areas that will be under EPA's regulatory authority.
[b] Number of new development/production sources projected to occur in OCS areas that will be under EPA's regulatory authority.
[c] Assumes that 20 percent of the sources would fail some of the tests on turbines and/or internal combustion engines and would have to perform retests.
[d] Assumes that 11 of the 23 new development/production sources projected to occur in OCS areas that will be under EPA's regulatory authority will apply for an operating permit.
[e] Assumes that new exploration sources would operate for a 6 month period.
[f] Number of new exploration source projected for the Southern California OCS area. These sources will be under the regulatory authority of the local districts.
[g] Number of existing development/production sources that will be under the regulatory authority of local agencies in the Southern California OCS area
[h] See text (section 6(a)) for explanation of how total 3-year annualized costs were calculated.

TABLE 9. TOTAL THREE-YEAR AND ANNUALIZED BURDEN ESTIMATES FOR STATE AND LOCAL AGENCIES

Burden Activity	Total Number of Agencies or Sources Affected (A)	Agency Burden/ Agency or Source		Number of Occurrences /Agency or Source During Three-Year Period (D)	Total Three-Year Burden	
		Labor-hours (B)	Costs (C)		Labor-hours (A x B x D)	Costs (A x C x D)
One-Time/Periodic						
Exploration Sources						
! Review NOI's/Preconstruction Permit for New Sources	4[a]	60	$2,040	1	240	$8,160
! Review Permit to Operate Applications	4[a]	40	$1,360	1[b]	160	$5,440
! Oversee/Attend Initial Compliance Tests	4[a]	56	$1,904	1[b]	224	$7,616
! Oversee/Attend Annual Compliance Test Retests	0.08[c]	56	$1,904	1[b]	4	$152
! Source Inspections (Quarterly)	4[a]	16	$544	2[d]	128	$4,352
! Review Reports	4[a]	8	$272	1[b]	32	$1,088
Development/Production Sources						
! Review Permit to Operate Renewal Applications	27[e]	40	$1,360	1[e]	1,080	$36,720
Subtotals					1,868	$63,528
Annual						
Development/Production Sources						
! Oversee/Attend Annual Compliance Tests	27[e]	56	$1,904	3[f]	4,536	$154,224
! Oversee/Attend Annual Compliance Test Retests	0.54[c]	56	$1,904	3[f]	90	$3,084
! Conduct Quarterly Inspections	27[e]	16	$544	12	5,184	$176,256
! Review Reports Submitted by Source	27[e]	8	$272	3	648	$22,032
	Subtotals				10,458	$355,596

Total Three-Year Annualized Costs[g]	**$158,476**

Footnotes for Table 9

[a] Number of new exploration sources projected for the Southern California area. These sources are under the regulatory authority of the local air pollution control districts.
[b] Assumes that new exploration sources will apply for and obtain PTO and operate for one year.
[c] Assumes that 20 percent of the sources will fail some of the tests and will have to perform retests, and that agency personnel will attend 10 percent of the retests.
[d] Assumes that new exploration sources will be inspected quarterly, twice during 6 months of operation.
[e] Number of existing development/production sources are under the regulatory authority of local agencies in the Southern California area.
[f] Assumes that existing development/production sources will apply for and obtain renewal PTO's during the 3-year time period covered by this ICR. The SBCAPCD's Rule 210 requires sources to renew their PTO's every 3 years.
[g] See text (section 6(a)) for explanation of how total 3-year annualized costs were calculated.

TABLE 10. TOTAL THREE-YEAR AND ANNUALIZED BURDEN ESTIMATES FOR EPA

Burden Activity	Total Number of Agencies or Sources Affected (A)	Agency Burden/ Agency or Source		Number of Occurrences /Agency or Source During Five-Year Period (D)	Total Five-Year Burden	
		Labor-hours (B)	Costs (C)		Labor-hours (A x B x C)	Costs (A x C x D)
One-Time-Only						
Review NOI/ Applications for Exploration Sources	20[a]	40	$1,360	1	800	$27,200
Review NOI/Applications for Development/Production	23[b]	268	$9,112	1	6164	$209,576
Oversee/Attend Initial Compliance Tests	23[b]	56	$1,904	1	1288	$43,792
Oversee/Attend Initial Compliance Test Retests	0.46[c]	56	$1,904	1	26	$884
Review Permits Submitted to Local Agencies	4[d]	40	$1,360	1	160	$5,440
Review Operating Permit Application	11[e]	40	$1,360	1	440	$14,960
Review Reports Submitted by Exploration Sources	20[a]	8	$272	1[f]	160	$5,440
Subtotals					9,038	$307,292
Annual						
Review Reports Submitted by Development/Production	23[c]	8	$272	1[g]	184	$6,256
Perform Consistency Updates of OCS Regulations	N/A[h]	1,040	$35,360	3[e]	3,120	$106,080
Subtotals					3,304	$112,336
Total Three-Year Annualized Costs[i]					-------	**$177,099**

[a] Number of new exploration sources under EPA regulatory authority.
[b] Number of new development/production sources under EPA regulatory authority.
[c] Assumes that 20 percent of the sources would fail some of the tests on turbines and/or internal combustion engines and would have to perform retests, and that agency personnel would attend 10 percent of the retests
[d] Assumes that 11 of the 23 new development/production sources projected to occur in OCS areas that will be under EPA's regulatory authority will apply for an operating permit.
[e] Assumes the local districts which have received delegation of the authority to implement and enforce the OCS regulations will submit four preconstruction permit application to the EPA for review and comment for the new exploration sources.
[f] Assumes that new exploration sources will submit one report.

Footnotes for Table 10 Continued

[g] Assume that the new development/production sources will, on average, submit one report

[h] This item is not applicable because the burden of performing consistency updates was based on FTE's as opposed to the number of agencies or sources. The burden associated with performing consistency updates was estimated to be two FTE's (at 2,080 hours per FTE) per year for 3 years.

[i] See text (section 6(a)) for explanation of how total 3-year annualized costs were calculated.